

EXHIBIT N



21st Floor
1251 Avenue of the Americas
New York, NY 10020-1104

Elizabeth McNamara
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January 6, 2023

Via First Class Mail

LeTicia Lee
1335 Jefferson Rd #20711
Rochester, NY 14602

**Re: Accepting Service on Behalf of Defendant Grammnet NH Productions Pursuant to
N.Y. CPLR § 312-a in *Lee v. Warner Media LLC et al.*, Index No. 134539-2022
(Ontario County Supreme Court of the State of New York)**

Dear Ms. Lee:

We represent Defendants Warner Media LLC; HBO Home Entertainment, Inc.; Warner Bros. Worldwide Television Distribution, Inc.; NBCUniversal Television Studio Digital Development LLC; CBS Broadcasting Inc.; and Grammnet NH Productions in the above-captioned action. We understand that Defendants Warner Media LLC; HBO Home Entertainment, Inc.; Warner Bros. Worldwide Television Distribution, Inc.; NBCUniversal Television Studio Digital Development LLC; and CBS Broadcasting Inc. have been served in this action, but that Defendant Grammnet NH Productions has not yet been served.

Defendant Grammnet NH Productions has received a copy of the complaint from the other named Defendants. Pursuant to N.Y. CPLR § 312-a, we are authorized to accept service of the attached complaint on behalf of Defendant Grammnet NH Productions. Please find attached the Acknowledgement of Receipt by Mail of Summons and Complaint on behalf of Defendant Grammnet NH Productions, which constitutes proof of service on Grammnet NH Productions under N.Y. CPLR § 312-a.

Sincerely,

A handwritten signature in blue ink, reading "Elizabeth A. McNamara", written over a horizontal line.

Elizabeth McNamara
Davis Wright Tremaine LLP

Enclosures

DWT.COM

Anchorage | Bellevue | Los Angeles | New York
Portland | San Francisco | Seattle | Washington, D.C.

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF ONTARIO

----- X

LETICIA LEE

Plaintiff,

Index No. 134539-2022

Hon. Craig J. Doran

-against-

**ACKNOWLEDGEMENT OF
RECEIPT OF SUMMONS
AND COMPLAINT ON
BEHALF OF DEFENDANT
GRAMMNET NH
PRODUCTIONS**

WARNER MEDIA LLC; HBO HOME
ENTERTAINMENT, INC.; WARNER BROS.
WORLDWIDE TELEVISION DISTRIBUTION,
INC.; NBCUNIVERSAL TELEVISION
STUDIO DIGITAL DEVELOPMENT LLC; CBS
BROADCASTING INC.; GRAMMNET NH
PRODUCTIONS

Defendants.

----- X

1. I received a summons and complaint (a copy of which is attached as **Exhibit A**) in the above-captioned matter at the offices of Davis Wright Tremaine LLP, 1251 Avenue of the Americas, 21st Floor, New York, NY 10020-1104.

2. PLEASE CHECK ONE OF THE FOLLOWING;

IF 2 IS CHECKED, COMPLETE AS INDICATED:

1. /X/ I am not in military service.

2. // I am in military service, and my rank and branch of services are as follows:


Rank: N/A

Branch of Service: N/A

TO BE COMPLETED REGARDLESS OF MILITARY STATUS:

Date: January 6, 2023

I affirm the above as true under penalty of perjury.

 Signature

Elizabeth A. McNamara Print Name

*Counsel for Defendants Warner Media LLC; HBO
Home Entertainment, Inc.; Warner Bros.
Worldwide Television Distribution, Inc.;
NBCUniversal Television Studio Digital
Development LLC; CBS Broadcasting Inc.; and
Grammnet NH Productions*

EXHIBIT A

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF ONTARIO

Index No.: 134539-2022

-----X
LETICIA LEE,

Plaintiff,

Amended
SUMMONS AND COMPLAINT

Claimant/Plaintiff designates
ONTARIO COUNTY
Hall of Justice as
the place of Trial

vs.

The basis of this venue is:
Plaintiff place of business
In Monroe County
LeTicia Lee
1335 Jefferson Rd #20711
Rochester, NY 14602

WARNER MEDIA LLC (HBO HOME ENTERTAINMENT, INC.; WARNER BROS.
WORLDWIDE TELEVISION DISTRIBUTION, INC.); NBC UNIVERSAL TELEVISION
STUDIO DIGITAL DEVELOPMENT LLC; CBS BROADCASTING INC.; GRAMMNET NH
PRODUCTIONS

Defendants,
-----X

To the Entities Named as Defendants Above:

PLEASE TAKE NOTICE THAT YOU ARE HEREBY SUMMONED to answer the Plaintiff's complaint and to serve a copy of your answer to the Plaintiff's address indicated herein within 20 days in New York State after the service of this Summons (not counting the day of service itself) or within 30 days after service is complete if the Summons is not delivered personally to you within New York State.

YOU ARE HEREBY NOTIFIED THAT should you fail to answer, a judgment will be entered against you by default for the relief demanded in the complaint.

(Page 1 of 10)

ONTARIO COUNTY CLERK'S OFFICE
.. FILED

NOV 16 2022

MATTHEW J. HOOSE, County Clerk
By
ACTING DEPUTY CLERK

TO THE SUPREME COURT OF THE STATE OF NEW YORK

The complaint of LeTicia Lee Pro Se Plaintiff, a private living woman (*not an attorney*), of Rochester, New York in Monroe County, New York, respectfully shows and alleges as follows:

1. The Defendants intentionally used and profited from my original treatment, and pilot script about an original sitcom ensemble in their twenties balancing life, relationships, and career in a major urban metropolitan city most of whom lived in one building entitled **GIRLFRIENDS** © 1991 (*Registered Treatment, Outline 1st Season, Character List, Pilot Episode*), as well as conversations spoken in good faith about my character and personal life during pitch meetings to create, develop, and distribute the series: **Living Single** (1993-1998), **Friends** (1994-2004), **Sex and the City** (1998-2004), and **Girlfriends** (2000-2008) all still airing in syndication in markets worldwide.
2. In March-April 1991, while doing preliminary research for Spike Lee's biopic **MALCOLM X** as an Independent Contractor for 40 Acres and a Mule Production Company, I had multiple telephone conversations with **Lucy Fisher** at Warner Bros. Film Division.
3. I told Lucy I was also a writer and indie Producer with an original sitcom
4. Lucy Fisher referred me to **Shelly Raskov** at Warner Bros Television Group with whom I spoke and pitched the sitcom pilot I had in development with my then writing partner, Tracey Moore, entitled **GIRLFRIENDS** and told her we would be in Los Angeles, CA the last week in April through the first week in May 1991 and could meet to further discuss.
5. My writing partners and I (We) traveled to Los Angeles, CA in the spring of 1991 and first had a social lunch with our former Fort Greene Brooklyn friend and neighbor **Warren Hutchinson**, who was then an up-and-coming Brooklyn comic/comedy writer, who was working on another sitcom pilot.

6. We shared current stories about our personal and business lives with Warren Hutchinson.
7. We practiced our pitch **in good faith** with Warren Hutchinson for our original series ensemble, GIRLFRIENDS before meeting with other Producers in Los Angeles.
8. We left a detailed Treatment for GIRLFRIENDS **about an ensemble group of urban twenty somethings - three female and three males most of whom lived in one Brooklyn Brownstone** with Warren Hutchinson in case he came upon a Hollywood Producer who could help us. He agreed to accept it and contact us if that should happen.
9. Until that time, there were no ensemble sitcoms based on the personal and career lives of twenty-somethings just finding their way in life in a competitive metropolitan city.
10. As young Indie Producers we had to prove we understood how to make this **ensemble sitcom** work with minimal risk to the production company/distributor.
11. We intentionally pitched the ensemble living in one NYC or urban dwelling or brownstone so as to have one location as we knew the sitcom had to be done affordably and we had become accustomed to being given the minimal budgets for urban works.
12. We were considered “young up and coming influencers” in the 1990s and were therefore able to get meetings with Indie Producers as many of our friends were just becoming famous and we were receiving calls from Producers who wanted us to work with them and bring our “rolodex”.
13. On May 1, 1991, Tracey Moore, and I also had a pitch meeting **in good faith** with **Karen Handel** who was then VP of Casting and Films & Original Programming at **HBO** then located at 2049 Century Park East Suite 4100 while in in Los Angeles, CA.

14. In 1991, we pitched our show entitled **GIRLFRIENDS © 1991** to Karen Handel at HBO which was mainly *a six person ensemble composed of three women and three men who met while studying at NYU surviving and sometimes thriving in their twenties despite various comedic situations while trying to balance life, relationships, and career.*
15. During that live pitch meeting with Karen Handel at HBO in Los Angeles, CA, we shared multiple comedic and often embarrassing incidents based on our own personal and business lives which we believed other twenty-somethings could relate and therefore made us better qualified to Produce as well as Write as we knew these stories first-hand.
16. In 1991, Karen Handel asked us if we would consider an all white cast, but we preferred to originate an urban show for young middle class women and urbanites trying to balance life, relationships and career at that time before considering the latter typical option of an all white cast.
17. In 1991, Karen Handel asked us what an **"ideal first season"** would look like for this proposed ensemble sitcom, GIRLFRIENDS.
18. In May of 1991, we returned to New York and **wrote and sent** an outline **"on spec"** via U.S. mail for an "ideal first season" of GIRLFRIENDS to Karen Handel at HBO in Los Angeles, CA never to hear from her again.
19. In 1993, Warren Hutchinson (my former Brooklyn neighbor and friend who was present on occasion during our sitcom development meetings) produced a pilot for a sitcom entitled, **LIVING SINGLE**, about four urban women and two men balancing life and career with **strikingly similar** character descriptions and stories we pitched to him from GIRLFRIENDS © 1991.

20. In 1993, Warren Hutchinson became a Consultant, Writer and Producer for the sitcom entitled **LIVING SINGLE (1993-1998)** about four urban twenty something women and two men who shared personal and career situations while living in one Brownstone.
21. Warren Hutchinson eventually became an Executive Producer at Warner Bros. Television.
22. While **LIVING SINGLE** aired at Warner Bros, it became publicly known that Warren Littlefield was looking for a "white version" of the "Living Single" sitcom for NBC.
23. Ironically, in 1994 **Warren Littlefield** hired two HBO writers, David Crane and Marta Kauffman who had access to "**shelved archives/pitches/works**" as former writers on staff at **HBO**. (*Wilson vs. The Walt Disney Company 2015; Skidmore vs. Led Zeppelin 2014*)
24. In 1994, **David Crane** and **Marta Kauffman** pitched a show they called "**Six of One**" to **Warren Littlefield** and then **Les Moonves** at **NBC** about an ensemble of three women and three men in their twenties who lived under one roof in New York City who met regularly at a cafe to discuss life, career and relationships which was *strikingly similar* to the show, **GIRLFRIENDS**, Tracey Moore and I pitched to Karen Handel at HBO in 1991 including facts and personal characteristics of our personal lives including that we and our friends met at a film/tv/arts crew industry favorite Brooklyn cafe called, **Mike's**.
25. Warren Littlefield hired the former **HBO writers**, David Crane and Marta Kauffman to write the pilot episode and series they eventually just called, **GIRLFRIENDS (1994-2004)** and changed our local social meeting place, **Mikes Café** to **PERKS Cafe**.
26. Warren Littlefield selected **James Burrows** (who also directed "Cheers" and "Frasier") to direct the **FRIENDS** pilot episode.

27. **FRIENDS'** sitcom cataclysmic success seems to have inspired **HBO executives** to officially bring **GIRLFRIENDS** © 1991 out of the HBO archives.
28. In 1998, it seems HBO renamed **GIRLFRIENDS** as **Sex and The City** much of which was inspired by the treatment, personal stories, and outlined episodes we wrote on spec.
29. It appears that **James Burrows** was so pleased with **FRIENDS'** sitcom fame and success and how "lucky" the now famous **GIRLFRIENDS** template was for he and others (**LIVING SINGLE**, **FRIENDS**, and **SEX and the CITY** that he shared the now "legendary story" with his friend, Mr. Allen "**Kelsey Grammer**" (*Frasier* sitcom lead and *Cheers* day player).
30. In 2000, Kelsey Grammer (formerly Happy Camper Productions now **Grammnet NH Productions** under **Viacom/CBS/Paramount**) developed and produced **GIRLFRIENDS** (2000-2008) using the **SAME** title and "*strikingly similar*" treatment/notes Tracey Moore and I shared with Karen Handel at HBO in 1991 only changing some character names and location from New York City to Los Angeles.
31. I do not know Yvette Lee Bowser (supposed creator of **LIVING SINGLE**).
32. I am not affiliated with Yvette Lee Bowser's production company, SisterLee Productions
33. I do not know nor have I ever met to my knowledge, Mara Brock or Salim Akil (supposed creators of **GIRLFRIENDS**)
34. I do not know Candace Bushnell (with the absurd back story behind **SEX and the CITY**)
35. I've never met Producer, Darren Star (supposed Creator of **Sex and the City**)
36. I don't know David Crane or Marta Kauffman who supposedly created **GIRLFRIENDS**.

37. The Defendants all appear to have participated in Hollywood's long standing practice of **deception and cover-ups** by calling Original Works created by under-represented content creators, women and minorities their own.
38. The Defendants appear to have participated in Hollywood's long standing practice of **gender bias** by not acknowledging these talented women of color and the original writers, creators and producers of GIRLFRIENDS from which the series: "Living Single", "Friends", "Sex and the City", and "Girlfriends" were all developed, produced, packaged and distributed worldwide for fame, profit and fortune.
39. The Defendants appear to have participated in Hollywood's long standing practice of **systemic racism** by not acknowledging we talented women of color and the original writers, creators and producers of GIRLFRIENDS ensemble sitcom from which the series: LIVING SINGLE, FRIENDS, SEX AND THE CITY and GIRLFRIENDS appear to have been developed, produced, packaged and distributed worldwide for profit.
40. The Defendants appear to have knowingly avoided acknowledgement and compensation of these black female writers and producers to support and create an alliance with traditional long standing Hollywood Industry systemic discriminatory practices which deeply affected their career and personal lives.

41. I turn on the television **EVER DAY** and **SEE** at least one of these **four sitcom** ensembles, **LIVING SINGLE**, **FRIENDS**, **SEX AND THE CITY**, and **GIRLFRIENDS** in syndication on one or more television stations and/ or streaming and **it re-ignites the emotional trauma** I have been experiencing for decades due to this intentional Hollywood deception.
42. I, Pro Se Plaintiff, **seek remedy** in the Entertainment Industry and all associated forms of Multi-Media to enforce **compensatory Pay for Work/Ideas** created and knowingly used in the Multi Media/ Entertainment industry for profit regardless of how long Original Creative Works are "**archived**".
43. **Further remedy**, that when Original Works (**even those archived**) are used, Production Companies and/or their Distributors should pay/compensate original creators of content associated with said Properties regardless of age, race, or gender or amount of time served in the industry.
44. It is an unfortunate age old Hollywood practice in the film, television, and music industries to "**shelve**" original ideas and completed works often created by young black artists and then release them later with white artists and producers which is why there are more "reboots" than original shows and movies today. Original Creators are now Independent.
45. **Further remedy** as unless Creators of Content decisively and intentionally choose to create work for use in public domain, Creators of Content shall participate in all profits associated with projects, creative content or programs derived from their contributions to those Creative Works from which studios and distributors profit unless both parties mutually agree said Creators are to be paid up front at a mutually acceptable price/rate.


46. Also **remedy** that Women and Producers of color shall also receive **fair and equitable production budgets** as their white peers for Comparable Works to enable them to successfully develop, produce, market, and distribute said Works for said studio for global distribution in any and all formats - or - LICENSE their Completed Independent Works at fair, equitable and competitive rates as their white male counterparts.
47. I, Pro Se Plaintiff, also seek **relief** for **career damages** and **emotional distress** (*Lamot vs. Gondek 1990*; *Trevino vs. Southwestern Bell Co 1979*) caused by continual copyright infringements by **Defendants** who completely disregarded my name and contact information from meetings and on all GIRLFRIENDS © 1991 material including the Copyright and then Writers Guild, East registration. **I am affected daily** by these sitcom ensemble episodes and ads for them that continuously air on television or stream online.
48. Defendants (Respondents) collectively **grossed over Nine Billion Dollars** in television advertising, film box office, DVD sales, merchandising, and streaming et al **revenues** over thirty plus years in continuum associated with creative concepts and personal and private material derived from direct and indirect personal meetings I had with Defendants in 1991 and my Intellectual Property entitled, GIRLFRIENDS © 1991 which Defendants and their associates had access to via Karen Handel at HBO, Warren Hutchinson , and Shelley Raskov at Warner Bros. Television (*Skidmore vs. Led Zepplin 2014*).
49. Defendants “**mocked**” my very careful personal and professional character by creating “**attorneys**” Miranda (Sex and the City) and Joan (Girlfriends), as well as a stylish naive **writer** as Carrie (Sex and the City) yet strong and **maternal** (Monica - FRIENDS and Khadija - LIVING SINGLE), while I only wanted other young women to know they could still succeed while being honest, attractive, intelligent and funny while still growing up in their twenties. *Hollywood often tries to make women (including me) one dimensional.*

50. **As a woman of color**, I have often had to fight for and **defend myself** to get paid or credited for my completed work when Hollywood producers believed it easier to deny or swipe and profit from my God given talents. I have experienced immense **career and emotional hardship** from these ongoing unfair business practices which no amount of money can fully compensate.

51. I, Pro Se Plaintiff, thereby seek fair and equitable compensatory **relief and restitution** in the amount of \$750,000,000 **plus** ten (10%) percent of all current and future royalties from gross revenues derived from the following ensemble sitcoms based on my Original Work/Content/Contributions: FRIENDS, LIVING SINGLE, GIRLFRIENDS, and SEX in the CITY and any/ all spinoffs derived from said intellectual properties **in any format** in perpetuity.

You have twenty (20) days in New York State and thirty (30) days if outside of New York State from the day after being served to respond to this Summons and Complaints.

Dated: Nov. 16, 2022



LeTicia Lee
Pro Se Plaintiff

cc:

WARNER MEDIA LLC (HBO HOME ENTERTAINMENT, INC.; WARNER BROS. WORLDWIDE TELEVISION DISTRIBUTION, INC.); NBC UNIVERSAL TELEVISION STUDIO DIGITAL DEVELOPMENT LLC; CBS BROADCASTING INC.; GRAMMNET NH PRODUCTIONS


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State of New York
County of Ontario

VERIFICATION

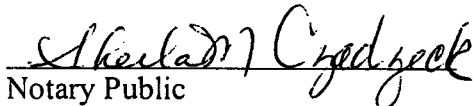
I, LeTicia Lee, a living private woman (*not an attorney*) and published author/writer, being duly sworn say I am the Pro Se Plaintiff in the above-mentioned civil action. I have read the foregoing Complaint and know the content herein. The same is true to my knowledge, except as matters therein stated to be alleged/appears as on information and belief and as to those matters, I believe them to be true.

To the best of my knowledge, information, and belief, formed after an inquiry reasonable under the circumstances, the presentation of these papers or the contentions therein are not frivolous as defined in subsection -c-of Section 130-1.1 of the Rules of the Chief Administrative Judge (22 NYCRR).


(Signature and Date)
LeTicia Lee
Pro Se Plaintiff

Sworn to before me this 16th

Day of November 2022


Notary Public

SHEILA M. CZADZECK
Notary Public, State of New York
Ontario County Reg. #04CZ6095959
Commission Expires 07/21/2022

Shema Yisrael, Adonia Eloheinu. Adonai echad.